

# INSTRUCTIONS FOR ON-SITE REVIEWS

(School Meal Service Accountability Review)

Sponsors (School Corporations) are required to conduct an annual on-site review for each building prior to February 1. Single school sites or single RCCI sites do not need to complete on-site reviews. Sponsors listed as two different sites in the organization but are actually in the same building do not need to conduct an on-site review.

An on-site review is the evaluation of the lunch counting and claiming procedures for each building by the sponsor. The reviewer may not conduct two or more lunch evaluations on the same day. The review should be conducted by a person who does not regularly work in the reviewed building. Therefore, a food service director or food service receptionist not directly working in the cafeteria or a cafeteria manager from a different building may conduct the on-site review. The State Agency field consultant will check the completed review forms during a school's State review to make sure an on-site review was completed. Keep the completed on-site review on file at the school for three years plus the current year.

Instructions for completing the on-site review form are below. Please note: **IF ANY QUESTIONS ARE ANSWERED "NO", A CORRECTIVE ACTION PLAN IS MANDATORY AND MUST SPECIFY A DATE FOR THE COMPLETION OF THE CORRECTIVE ACTION PLAN. WITHIN 45 DAYS OF THE REVIEW, THE SPONSOR MUST CONDUCT A FOLLOW-UP ON-SITE REVIEW TO CONFIRM THAT THE CORRECTIVE ACTION PLAN RESOLVED THE PROBLEM.**

**Question #1** – Determine if the system provides a meal count at the point of service. The point of service is the place in the food service operation where a school determines that a meal is a reimbursable free, reduced-price, or paid lunch. To complete this question, visit each building during the meal service to determine if the school is using a system that provides a meal count at the point of service. Appropriate methods for documenting meal counts include using rosters, tickets, cash registers, and scanners at the point of service. A school's procedure must ensure that meals counted meet the meal pattern requirements and are totaled daily by category.

**Question #2** – Establish if the point of service meal count is used to determine the school's claim for reimbursement. Notice if daily counts for all serving lines and serving periods are correctly totaled and recorded. The person completing the on-site review should observe how meal counts from cashiers are combined and recorded for the daily report **at the end** of the meal service and should also obtain a count using the same procedure as the food service worker such as counting tickets in a ticket system or counting check marks in a roster check off system. An automated system may be tested by manually performing some of the functions of the system.

The following is a list of **UNACCEPTABLE** meal count procedures:

- (1) Meal counts taken at the beginning of the service line, unless a school has been pre-approved for an alternate system by the State Agency;
- (2) "Backed out" systems that subtract one number (e.g., the number of free and reduced-price meals served) from the total meal counts to get another number (e.g., the number of paid meals served);
- (3) Cash "backed out" (e.g., dividing total cash received by the meal price to determine meals sold);
- (4) Meals not checked for all components (e.g., meals not checked to see if they meet the meal pattern requirements);
- (5) Tray or plate counts (e.g., counting the trays before being served and seeing how many are leftover at the end of service);
- (6) Morning/classroom counts (e.g., taking reimbursement counts in the classroom before students are served); or
- (7) Attendance records (using attendance records instead of point of service to determine the reimbursement count).

**IF ANY OF THESE MEAL COUNT PROCEDURES ARE TAKING PLACE, THE SYSTEM IS UNACCEPTABLE.**

**Questions #3** – Determine if the person responsible for monitoring meals correctly identifies reimbursable meals for the menu planning option selected by the school. If offer versus serve is implemented, make sure those responsible for identifying reimbursable meals understand how many components or food items are needed to create a reimbursable meal.

**Question #4** – Determine if the school has a plan and implements policies based on the following situations (as applicable):

- (1) Incomplete meals (e.g., Meals not meeting meal pattern requirements as set by the State Agency)
- (2) Second meals (e.g., Only one meal per student per day may be claimed for reimbursement and additional meals should be sold as a meal not eligible for reimbursement)
- (3) Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, PINs (e.g., School Food Authorities may establish their own procedures, except any system which limits the number of tickets reissued must conform to State Agency standards)
- (4) Visiting student meals
- (5) Adult and non-student meals

- (6) A la carte (e.g. Meals not meeting meal pattern requirements as set by the State Agency)
- (7) Student worker meals
- (8) Field Trips (e.g., Meals may be reimbursed if they meet meal pattern requirements and are consumed as part of a school-related function)
- (9) Charged and/or prepaid meals
- (10) Offer vs. Serve

Question #5 – Determine if there is a method of identifying non-reimbursable meals (i.e. as meals not meeting the meal pattern requirements, seconds, adult meals, a la carte items, etc.) which are not included in the reimbursable meal count. Those identified as non-reimbursable meals should not be included in the reimbursable meal count and claimed for reimbursement.

Question #6 – Determine if the site has multiple staff properly trained to monitor and count meals by category (free, reduced price, and paid). This is required in case a substitute is needed.

Question #7 – Determine if there is a back-up system in place if the main meal counting and claiming system is unavailable. Make sure the staff is fully trained in the utilization of this system.

Question #8 – Determine if the meal count reports submitted to the sponsor are accurate. The person conducting the on-site review should make sure the individual school meal counts, by category, submitted to the sponsor on a daily, weekly, or monthly basis are accurate. The daily recording method must ensure that correct counts by category are reported in a way that can be easily read, edited, and consolidated into an accurate monthly claim for reimbursement.

Question #9 – Determine if the monthly claim figures for each school matches the monthly claim figures on file at the sponsor level. Evaluate the system by tracking the school's meal count totals by category. In addition, determine if the counts reported by the school were used by the sponsor in the consolidation of the Claim for Reimbursement.

Question #10 – Determine the number of students approved by category. This is your enrollment by free, reduced price, and paid. Then determine the day's meal counts by category. Once you have determined the meal count by free, reduced price, and paid compare it to the number of students approved by category. The day's meal counts by category should not exceed the meal count by category.

Question #11 – Determine if the system prevents overt identification. Eligibility information must never be publicized nor used in such a way that a student's eligibility category might be recognized by another student. Students receiving free or reduced priced benefits must not, at any time, be treated differently from students who do not receive these benefits. SFAs are required to ensure that there is no physical segregation, discrimination, or overt identification of any student eligible for free or reduced price benefits.

The following is a list of UNACCEPTABLE meal count procedures:

- (1) Unacceptable coding system (using P, F, and R to identify students);
- (2) Availability of tickets/tokens (tickets/tokens only available to specific categories such as paid students only);
- (3) All cash line (specific lines for categories such as a line for paid students only);
- (4) Visual or vocal ID (others can see or hear if a child is paid, free, or reduced); or
- (5) Serving lines limited (free or reduced kids are unable to go through certain lines such as a premium meal line).

**NOTE: THE FOLLOWING TWO QUESTIONS ARE FOR ALL SPONSORS EXCEPT FOR SPONSORS ON PROVISION 2 OR 3 IN NON-BASE YEARS OR RCCIs WITH ONLY RESIDENTIAL CHILDREN:**

Question #12 – Determine if monitors and meal counters have access to an up-to-date list of free, reduced price, and paid meal recipients. Make sure this is regularly updated to account for changes in the attendance and eligibility.

Question #13 – Determine if the sponsor correctly performs edit checks (claim review process) prior to submitting claims to the State Agency. Edit checks are used to prove that an accurate claim for reimbursement has been made. Compare the meal counts by category to the number eligible times the attendance factor on a daily basis. If monitoring discloses problems with a school's meal counts, the sponsor must implement a corrective action plan to resolve all problems identified. Most point of sale systems have built-in edit checks which would need to be evaluated by the reviewer. For more information on edit checks, go to the [School Nutrition Program's website](#).